

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

and

AMERICAN FEDERATION OF
TEACHERS

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, *et al.*

Defendants.

Case No.: 1:25-cv-02429-MKV

**REPLY DECLARATION OF
JONATHAN ROSENTHAL IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

I, Jonathan Rosenthal, hereby declare as follows:

1. I am an attorney at the law firm Altshuler Berzon LLP in San Francisco, CA, and am a member of the State Bar of California. I am co-counsel for Plaintiffs in this matter, and have been admitted to practice *pro hac vice* in this case. I make this statement based on personal knowledge, and if called as a witness could and would testify competently thereto.

2. This declaration is submitted in support of Plaintiffs' Reply in support of their motion for a preliminary injunction.

3. Attached hereto as **Exhibit 62** is a true and correct copy of the following article: Sara Reardon, *Exclusive: NIH freezes all research grants to Columbia University*, ScienceInsider (Apr. 9, 2025), downloaded from <https://www.science.org/content/article/nih-freezes-all-research-grants-columbia-university>.

4. Attached hereto as **Exhibit 63** is a true and correct copy of the following article: Maddie Khaw, *All of Columbia's NIH Funding Is Apparently Frozen. Here's What That Looks Like for One Researcher.*, Chronicle of Higher Education (Apr. 11, 2025), downloaded from <https://www.chronicle.com/article/all-of-columbias-nih-funding-is-apparently-frozen-heres-what-that-looks-like-for-one-researcher>.

5. Attached hereto as **Exhibit 64** is a true and correct copy of a letter from Josh Gruenbaum, Sean R. Keveney and Thomas E. Wheeler, to Alan M. Garber, President of Harvard University (Apr. 11, 2025), downloaded from <https://www.harvard.edu/research-funding/wp-content/uploads/sites/16/2025/04/Letter-Sent-to-Harvard-2025-04-11.pdf>, and available at <https://perma.cc/NH46-XV98>.

6. Attached hereto as **Exhibit 65** is a true and correct copy of the following article: Michael C. Bender, Alan Blinder, and Jonathan Swan, *Inside Trump's Pressure Campaign on*

Universities, New York Times (Apr. 14, 2025), downloaded from

<https://www.nytimes.com/2025/04/14/us/politics/trump-pressure-universities.html>.

7. Attached hereto as **Exhibit 66** is a true and correct copy of the following statement: *Sustaining Columbia's Vital Mission*, Columbia University Office of the President (Apr. 14, 2025), downloaded from <https://president.columbia.edu/news/sustaining-columbias-vital-mission>.

8. Attached hereto as **Exhibit 67** is a true and correct copy of a letter from William A. Burck and Robert K. Hur, to Josh Gruenbaum, Sean R. Keveney and Thomas E. Wheeler (Apr. 14, 2025), downloaded from <https://www.harvard.edu/research-funding/wp-content/uploads/sites/16/2025/04/Harvard-Response-2025-04-14.pdf>, and available at <https://perma.cc/TB3P-W6QE>.

9. Attached hereto as **Exhibit 68** is a true and correct copy of the following press release: *Joint Task Force to Combat Anti-Semitism Statement Regarding Harvard University*, U.S. Dep't of Education (Apr. 14, 2025), downloaded from <https://www.ed.gov/about/news/press-release/joint-task-force-combat-anti-semitism-statement-regarding-harvard-university>, and available at <https://perma.cc/A5ZW-VFYQ>.

10. Attached hereto as **Exhibit 69** is a true and correct copy of the following article: Liz Essley Whyte, Douglas Belkin, and Sara Randazzo, *The Little-Known Bureaucrats Tearing Through American Universities*, Wall Street Journal (Apr. 14, 2025), downloaded from <https://www.wsj.com/us-news/education/anti-semitism-task-force-who-247c234e>.

11. Attached hereto as **Exhibit 70** is a true and correct copy of the following article: Alan Blinder, *Trump Has Targeted These Universities. Why?*, New York Times (April 15, 2025), downloaded from <https://www.nytimes.com/article/trump-university-college.html>.

12. Attached hereto as **Exhibit 71** is a true and correct copy of the following webpage: *Miguel S. Urquiola*, Columbia University, Office of the Provost, downloaded from <https://provost.columbia.edu/people/miguel-s-urquiola>, last accessed on May 1, 2025.

13. Attached hereto as **Exhibit 72** is a true and correct copy of the following article: Meghnad Bose and Sacha Biazzo, *Inside Columbia's Betrayal of its Middle Eastern Studies Department*, *The Intercept* (Apr. 16, 2025), downloaded from <https://theintercept.com/2025/04/16/columbia-middle-eastern-studies-trump-attacks/>, and available at <https://perma.cc/6WH8-AXUY>.

14. Attached hereto as **Exhibit 73** is a true and correct copy of a social media post of President Donald Trump (@realDonaldTrump), from Truth Social, posted on Apr. 16, 2025, 7:05AM, downloaded from <https://truthsocial.com/@realDonaldTrump/posts/114347313852363347>.

15. Attached hereto as **Exhibit 74** is a true and correct copy of the following article: Anil Oza and Megan Molteni, *NIH said to have halted awarding of new grants to top universities*, *STAT News* (Apr. 18, 2025), downloaded from <https://www.statnews.com/2025/04/18/nih-halts-grants-to-universities-with-frozen-funds-harvard-columbia-northwestern-cornell/>, and available at <https://perma.cc/6A4R-S63S>.

16. Attached hereto as **Exhibit 75** is a true and correct copy of a social media post of Max Kozlov (@maxdkozlov), from X.com, posted on Apr. 18, 2025, 3:24PM, downloaded from <https://x.com/maxdkozlov/status/1913327818873700556>, and available at <https://perma.cc/H9M5-J6YA>.

17. Attached hereto as **Exhibit 76** is a true and correct copy of the following article: Nandika Chatterjee, *Trump Takes Personal Revenge on Harvard's Lawyer for Standing Up to*

Him, The Daily Beast (Apr. 24, 2025), downloaded from <https://www.thedailybeast.com/trump-takes-personal-revenge-on-harvards-lawyer-for-standing-up-to-him/>, and available at <https://perma.cc/GN5D-MKED>.

18. Attached hereto as **Exhibit 77** is a true and correct copy of a letter from Linda E. McMahon, to Alan M. Garber, President of Harvard University (May 5, 2025), downloaded from <https://x.com/EDSecMcMahon/status/1919517481313427594>, and available at <https://perma.cc/7QGC-WYE7>.

19. Attached hereto as **Exhibit 78** is a true and correct copy of the following statement: *Preserving Columbia's Critical Research Capabilities*, Columbia University Office of the President (May 6, 2025), downloaded from <https://president.columbia.edu/news/preserving-columbias-critical-research-capabilities>.

20. Attached hereto as **Exhibit 79** is a true and correct copy of the following article: DPP/DPPOS Research Group, *An open letter to the Columbia administration*, Columbia Spectator (May 4, 2025), downloaded from <https://www.columbiaspectator.com/opinion/2025/05/04/an-open-letter-to-the-columbia-administration/>.

21. Attached hereto as **Exhibit 80** is a true and correct copy of the following article: Liz Essley Whyte and Douglas Belkin, *Trump Administration Proposes Terms for Federal Oversight of Columbia University*, Wall Street Journal (May 5, 2025), downloaded from <https://www.wsj.com/us-news/education/trump-columbia-university-consent-decree-proposal-d21830f2>.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 8, 2025

Signed: /s/ Jonathan Rosenthal

Jonathan Rosenthal

Counsel for Plaintiffs